

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In re:)	Bankruptcy Case No. 14 B 27066
Michael A. Wolf, Debtor)	Adversary Proceeding No.: 16 A 00066
_____)	
)	
N. Neville Reid, not individually,)	
but solely in his capacity as Chapter 7)	Case Nos. 18 cv 07952, 18 cv 07953,
Trustee for the bankruptcy estate of)	19 cv 01978, 19 cv 08154 and 19 cv 08299
Michael A. Wolf)	
)	The Honorable John J. Tharp, Jr.
)	
Plaintiff / Appellee,)	
v.)	
)	
Michael Wolf,)	
)	
Defendant /Appellant.)	

**MOTION TO FILE A CONSOLIDATED RESPONSE TO MICHAEL AND SCOTT
WOLF’S MOTIONS FOR REHEARING/RECONSIDERATION**

N. Neville Reid, not individually but solely as chapter 7 trustee (the “Trustee”) of the bankruptcy estate of Michael Wolf, the Plaintiff/Appellee, by his attorneys Nisen & Elliott, LLC, as his Motion To File A Consolidated Response To Michael And Scott Wolf’s Motions For Rehearing/Reconsideration, states as follows:

1. On September 30, 2022, this Court issued a Memorandum Opinion And Order in Case Nos. 18 cv 07952, 18 cv 07953, 19 cv 01978, 19 cv 08154 and 19 cv 08299. The Memorandum Opinion And Order is, in effect, a consolidated memorandum and order that was entered identically and separately in each of the five separate appellate cases.

2. On October 14, 2022, Scott Wolf (one of the appellants) filed a Motion For Rehearing/Reconsideration in Case Nos. 19 cv 08153, 19 cv 08154 and 19 cv 01978.

3. On October 14, 2022, Michael Wolf (another appellant) filed a different Motion

For Rehearing/Reconsideration in Case Nos. 18 cv 07952 and 18 cv 08299.

4. If the Trustee were required to file *different* responses to each motion it would increase the time necessary to prepare as well as for this Court's review. It would also likely cause confusion because certain facts and issues would overlap and these same facts and issues would need to be included in multiple briefs.

5. Filing one consolidated response in the five separate cases is consistent with the appellate process to date as well as the manner the Court dealt with the many appeals filed by the *pro se* appellants.

6. For all of these reasons, movant submits that a consolidated response to the Appellants' motions for rehearing/reconsideration is appropriate.

7. Appellants filed two briefs totaling 29 pages and containing approximately 7,328 words.

8. Trustee-Appellees simply seek the same number of words.

9. This Court already permitted the movant to file a consolidated brief as appellee prior to the present motions for rehearing/reconsideration.

10. The Trustee-Appellee is concurrently filing his consolidated response in all cases.

Wherefore, for all of the foregoing reasons, N. Neville Reid, not individually, but solely in his capacity as chapter 7 trustee for the bankruptcy estate of Michael A. Wolf, requests that: (a) the consolidated brief filed by Trustee-Appellee be deemed his response in all five cases; (b) the Trustee-Appellee be granted a total of 7,328 words; (c) for all further relief this court deems just.

N. Neville Reid, not individually, but solely
in his capacity as chapter 7 trustee for the
bankruptcy estate of Michael A. Wolf,

/s/ Daniel P. Dawson

One of his attorneys

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